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Sent: 2/9/2018 4:05:54 PM
To: Singh, Sheetal (CDPH-EMB) [sheetal.singh@cdph.ca.gov]; juanita.bacey@dtsc.ca.gov; LEE, LILY [LEE.LILY@EPA.GOV]
Subject: RE: 3 Options clarification question
Attachments: smime.p7s

Sheetal, Nina, and Lily: would you please check my understanding of the 3 options and make corrections/clarifications as needed. Thanks, Pat

1) Follow Parcel G ROD and existing Work Plans as a guide and use industry standard practices to redo all of the work. That is, excavate all trench units, sample excavation boundaries and sample excavated soil before it is cleared for reuse as backfill. This would result in unrestricted release with no ICs.

2) Using the original work plan methods, reevaluate 25% or 16 trench units chosen by the regulators and 47% or 15 building site survey units selected by the regulators. Durable covers would be removed to expose former building sites. Building survey units are not included in this proposal. If the trench unit and former building site survey units pass, they receive unrestricted release and the remainder of soil and building site survey units receive NFA with ICs. If they fail, remediate exceedances and consider safety measures parcel-wide, such as a durable cover with the thickness dependent on PRGs estimated with the PRG calculator. Remove all asphalt and perform gamma scans. No determination made regarding specifics of ICs. This option results in a 90% confidence that 90% of the soil survey units meet requirements.

3) Targeted evaluation of survey units include 33% of trench survey units and 50% of building survey units based on methodologies of original work plan and industry standard practices. In order to reach 95% confidence level mandated by their management, additional work includes 100% surface scan of remaining trenches plus core sampling. Any investigation level exceedances for scans, cores or surfaces would require a sample. For the remainder of the building outside areas, 100% surface scans plus 18 systematic samples would be required. If only one fails, re-excavate all trench units and/or resurvey building survey units. Core samples would be used to address the sides of the trenches and fill material. They would require 18 cores per survey unit and three samples per core. Samples would be analyzed from the bottom and top of core, and at the highest gamma reading. This results in unrestricted release for all soil and former building site survey units. Depending on what is found, a ROD amendment may be required.

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